UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

COLORADO FIRE SPRINKLER, INC.,

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Respondent,

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and

Case Nos. 27-CA-115977, 27-CA-120823

ROAD SPRINKLER FITTERS LOCAL UNION NO. 669, U.A., AFL-CIO,

*

Charging Party.

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MOTION FOR EXTENSION OF TIME TO FILE STATEMENTS OF POSITION

Pursuant to Section 102.2 of the NLRB Rules and Regulations, Charging Party Road Sprinkler Fitters Local Union No. 669, U.A., AFL-CIO ("Charging Party") respectfully submits this Motion for an Extension of Time in Which to File Statements of Position to address the issues raised by the Court's remand to the Board:

- 1. Based on Charging Party's earlier request, the time for filing Statements of Position was extended and they are currently due tomorrow, March 15, 2019.
- 2. Charging Party also filed a Motion to Remand to the Region on March 8, 2019, and mistakenly believed that the Motion would be ruled on in advance of the March 15, 2019 deadline for filing Statements of Position.
- 3. Charging Party hereby requests a second extension of time for *all* parties to file Statements of Position until the later of April 1, 2019 or the date when the Board has ruled on Charging Party's Motion to Remand, as a Board ruling granting the Motion to Remand would eliminate the need to file Statements of Position.

- 4. We regret and apologize for any delay or disruption in the Board's processes that we may have caused.
- 5. Counsel for Charging Party has contacted Region 27 and counsel for Colorado Fire Protection and they have both consented to this Motion.

Date: March 14, 2019

Respectfully submitted,

/s/ William W. Osborne, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2019, I electronically filed and served Local 669's Motion for an Extension of Time to File Post-Hearing Briefs via the NLRB's e-filing portal and also forwarded a copy by electronic email to the following:

Paula Sawyer Regional Director, Region 27 National Labor Relations Board paula.sawyer@nlrb.gov

Thomas A. Lenz Counsel for Respondent <u>tlenz@aalrr.com</u>

/s/ William W. Osborne, Jr. William W. Osborne, Jr.